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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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Luann Gould, :
Plaintiff, : 05 CV 11118 (PBS)
- v. - :
Lucent Technologies, Inc., :
: :
Defendant. :
----- x

Motion in Limine

Plaintiff, Luann Gould, moves in limine for an order precluding defendant and its counsel from introducing into evidence, referring to, or otherwise using at trial certain documents, such as records of other Lucent employees who have requested and/or been granted FMLA leave, and records concerning Lucent employees who reached Level V of the Absence Control Plan, which were not timely produced in response to Plaintiff's discovery requests.

The basis for this Motion is that these documents should have been disclosed no later than February 21, 2006, and were withheld without good reason with unfair prejudice to the Plaintiff.

HARVEY, KLEGER & THOMAS

By: /s/ Linda A. Harvey

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Dated: January 25, 2007